

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN**

JANE DOE,

Case No. 3:2021-cv-12492

Plaintiff,

v.

UNIVERSITY OF MICHIGAN,  
et al.

Defendants.

---

**PLAINTIFF'S UNOPPOSED MOTION FOR EXTENSION OF  
TIME TO RESPOND TO DEFENDANT'S MOTION TO  
DISMISS**

---

**NOW COMES** Plaintiff JANE DOE, by and through her attorney,  
with this Unopposed Motion for Extension of Time to Respond to  
Defendant's Motion to Dismiss and hereby state the following:

**PLAINTIFF'S UNOPPOSED  
MOTION FOR EXTENSION OF  
TIME TO RESPOND TO  
DEFENDANT'S MOTION TO DISMISS**

1. Defendants filed their Motion to Dismiss pursuant to Fed. R. Civ. P. 12(b)(6) on March 10, 2022 (ECF 17).
2. Plaintiff's Response to Defendant's Motion to Dismiss is due on March 31, 2022.
3. Plaintiff's attorney has recently become legally blind. While accommodations are being put into place, it takes Mr. Altman considerably longer to read, write and prepare documents.
4. Plaintiff respectfully requests a 30-day extension of time to file their Response to Defendants Motion to Dismiss, making the Response due on or before April 30, 2022.
5. Plaintiff has conferred with the Defendants on the present Motion. Defendants have advised that they will not oppose the Motion.
6. This request is not filed for the purpose of delay, and no party will be prejudiced by the granting of this motion.

**WHEREFORE** the Plaintiff requests that the Court approve the foregoing Motion.

Date: March 15, 2022

Respectfully Submitted,



Keith Altman, Esq.  
Law Office of Keith Altman  
33228 West 12 Mile Road, Suite 375  
Farmington Hills, Michigan 48334  
Telephone: (987) 987-8929  
keithaltman@kaltmanlaw.com  
*Attorneys for Plaintiff*

# EXHIBIT A

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN**

JANE DOE,

Case No. 3:2021-cv-12492

Plaintiff,

v.

UNIVERSITY OF MICHIGAN,  
et al.

Defendants.

---

---

**ORDER**

---

This Matter, having come before the Court on Plaintiff's  
Unopposed Motion for Extension of Time to Respond to Defendants  
Motion to Dismiss, and that the Motion is unopposed and in good cause,  
it is hereby

ORDERED that Plaintiff's Motion for Extension of Time to Respond to Defendants Motion to Dismiss is granted and the Plaintiff shall have until April 30, 2022 to file their Response.

March \_\_\_, 2022.

BY THE COURT

---

United States Magistrate  
Judge Elizabeth A. Stafford

## CERTIFICATE OF SERVICE

I certify that on March 15, 2022, I served the foregoing  
Unopposed Motion for Extension of Time to Respond to Defendants  
Motion to Dismiss upon all parties herein by filing copies of same using  
the ECF System.

Respectfully Submitted,



Keith Altman, Esq.  
Law Office of Keith Altman  
33228 West 12 Mile Road, Suite 375  
Farmington Hills, Michigan 48334  
Telephone: (987) 987-8929  
keithaltman@kaltmanlaw.com  
*Attorneys for Plaintiff*